

DEPARTMENT OF SOCIAL SERVICES
744 P Street, Sacramento, CA 95814



July 28, 1988

ALL-COUNTY LETTER NO. 88-89

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY FISCAL OFFICERS
ALL COUNTY AUDITOR CONTROLLERS
ALL COUNTY ADMINISTRATIVE OFFICERS

SUBJECT: COUNTY WELFARE DEPARTMENT (CWD) ADMINISTRATIVE EXPENSE
CLAIM

This is to provide time study instructions for the July - September 1988 quarter. Included are instructions related to Miller v. Woods, Aid to Families with Dependent Children (AFDC) Homeless Assistance and Immediate Need, Immigration Reform and Control Act-Foster Care (IRCA-FC), In-Home Supportive Services (IHSS) welfare fraud activities, the Greater Avenues for Independence (GAIN) Program, Electronic Data Processing (EDP) - Statewide Automated Welfare System (SAWS) and non-SAWS, Staff Development, casework first-line supervisors, nonallocable time, and direct service delivery time.

Following is a list of the time study forms and revision dates effective with the July - September 1988 quarter:

<u>Form Title</u>	<u>Form No.</u>	<u>Revision Date</u>
Social Services Worker Time Study	DFA 46	8/88
Eligibility and Nonservices Time Study	DFA 43	8/88
Welfare Fraud Investigators Time Study	DFA 856	8/88
Employment Services Time Study	DFA 52	8/88
Electronic Data Processing Time Study	DFA 48	8/88
Staff Development Time Study	DFA 50	8/88
Clerical and Administrative Support Staff Time Study/Time Certification	DFA 7	7/88

Social Services Worker Time Study (DFA 46)

Miller v. Woods, IHSS Program

The February 11, 1988 settlement in the Miller v. Woods court case required the State Department of Social Services (SDSS) to implement regulations to grant retroactive relief to qualified IHSS recipients or applicants and their housemate providers. These regulations, which address how retroactive benefits are to be applied for and eligibility determined, are to be released by

July 31, 1988. Time spent by social services casework staff performing the following Miller v. Woods activities is to be recorded to IHSS Staff Activities/Services Arrangement, Line O of the DFA 46:

- o Providing information and forms to claimants and potential claimants,
- o Taking applications,
- o Reviewing, evaluating claims and determining eligibility,
- o Searching for and maintaining case files,
- o Calculating retroactive benefits,
- o Processing underpayments, when appropriate,
- o Updating the Case Management Information and Payrolling System,
- o Issuing Notices of Action (NOAs),
- o Determining how lump sum payment affects or does not affect continued eligibility of current IHSS recipients, and
- o Preparing and submitting statistical reports to the SDSS.

Eligibility and Nonservice Time Study (DFA 43)

AFDC Homeless Assistance Activities

Homeless Assistance regulations were effective February 1, 1988. Homeless Assistance activities are to be recorded on Line A1, AFDC-Family Group/Unemployed (FG/U) - Intake, Line A2 - Continuing, Line N - Refugee Resettlement Program - AFDC (RRP-AFDC), and Line Q - Refugee Demonstration Project (RDP).

Intake activities include determining the AFDC-FG/U, RRP-AFDC, and RDP applicant's eligibility for temporary shelter or permanent housing payments, granting or denying the homeless assistance payment, arranging direct payments to providers, completing NOAs related to the homeless assistance payment, authorizing the homeless assistance payment, and determining good cause to extend temporary shelter assistance.

Continuing activities include determining the AFDC-FG/U, RRP-AFDC, and RDP recipient's eligibility for temporary shelter or permanent housing payments, granting or denying the homeless

assistance payment, arranging direct payments to providers, completing NOAs related to the homeless assistance payment, authorizing the homeless assistance payment, and determining good cause to extend temporary shelter assistance.

Immediate Need

As a result of the Welfare Recipient's League (WRL) v. Woods court order, Counties were instructed via All-County Letter (ACL) No. 88-57, dated June 9, 1988, to cease applying AFDC immediate need regulations at EAS 40-129.2, effective April 21, 1988. Counties were also instructed to determine immediate need based upon the definition provided in the pre-1978 regulations at EAS 40-129.1. Immediate need activities are to be time studied to the AFDC-FG/U Intake, RRP-AFDC, and RDP lines on the DFA 43.

IRCA - AFDC-FC

The Federal Family Support Administration, Department of Health and Human Services, recently informed this Department of a change in policy regarding the allowability of AFDC-FC costs for reimbursement from the State Legalization Impact Assistance Grant (SLIAG). The Nonfederal share of the administrative costs of AFDC-FC for eligible legalized alien children are allowable for SLIAG reimbursement and will be 100 percent federally funded. Due to the late notice of this change, the DFA 43 does not reflect IRCA-FC, but will be revised next quarter to show this change. During the August time study period, eligibility workers are to record time spent for IRCA-Federal AFDC-FC and IRCA-Nonfederal AFDC-FC on blank lines as described below.

Line R4: IRCA - General Relief - Include time spent on Immigration and Nationality Act (INA) Section 245A children and Special Agricultural Workers' (SAWs) children, who are NOT eligible for Federal or Nonfederal AFDC-FC, and who are placed in out-of-home care due to the receipt of child welfare services.

Line R5: IRCA - Federal AFDC-FC - Record time spent performing eligibility determinations and grant maintenance activities for INA Section 245A alien children in temporary or permanent resident status (I 688-245A and I 551-245A) and for SAWs children (I 688-210/210A and I 551-210/210A), who are otherwise eligible for Federal AFDC-FC.

Line R6: IRCA - Nonfederal AFDC-FC - Record time spent performing eligibility determinations and grant maintenance activities for INA Section 245A children with permanent resident status (I 551-245A) and for SAWs children (I 688-210/210A and I 551-210/210A), who are otherwise eligible for Nonfederal AFDC-FC.

Welfare Fraud Investigators Time Study (DFA 856)

A new line, IHSS County Services Block Grant, has been added to the DFA 856. Time spent by welfare fraud investigators on investigation and prosecution of alleged fraud activities related to an IHSS case is to be recorded on this line.

In addition, Counties are reminded that only welfare fraud investigators who have peace officer status under Penal Code Section 830 and their first-line supervisors may time study on the DFA 856.

Employment Services Time Study (DFA 52)

In order to provide consistency between time study activities and the data reported on the GAIN Monthly Activity Report (GAIN 25), the following time study definitions for components of the GAIN Program have been revised effective with the July - September 1988 quarter:

Case Management

1. Line C1, previously entitled Job Club Workshop, is now designated as Job Club. This line will be used to record case management activities which relate to the one-week workshop followed by the two-week supervised job search. Time is recorded on this line only if the participant is assigned to Job Club prior to Assessment. If the participant is assigned to the Job Club Workshop after Assessment, case management time must be recorded on Line C3 - Other Job Search Services.
2. Line C2, previously entitled Job Search, is now designated as Supervised Job Search. This line will be used to record case management activities which relate only to the three-week Supervised Job Search component. Time is recorded on this line only if the participant is assigned to Supervised Job Search prior to Assessment. If the participant is assigned to Supervised Job Search after Assessment, case management time must be recorded on Line C3 - Other Job Search Services.
3. Line C3, previously entitled Basic Education, is now designated as Other Job Search Services. This line will be used to record case management activities related to job search services which occur either after Assessment or between components. These services include Job Club, Supervised Job Search, Unsupervised Job Search, Job Placement and Job Development.

4. Line C5, previously entitled Vocational Training, is now designated as Vocational Training and Education. This line will be used to record case management activities which relate to participants in vocational skills or college training. This line would also include case management time related to participants in self-initiated programs.
5. Line C6, previously entitled Preemployment Preparation (PREP), is now designated as Short-Term PREP. This line will be used to record time spent on case management activities related to participants assigned to Short-Term PREP, which is limited to three months.
6. Line C7, previously entitled On-the-Job Training (OJT), is now designated as Long-Term PREP. This line will be used to record time spent on case management activities related to participants assigned to Long-Term PREP, which is limited to twelve months.

Program Operations

Clarification is added to the definition of monitoring activities required for the employment and training contracts. Monitoring activities which may be time studied as a program operations activity include site visits to employers or training contractors which are necessary to resolve participation issues, e.g., attendance, behavior. Do not include time spent by administrative contract staff negotiating and preparing contracts or performing fiscal monitoring of contracts.

Note: The definition of program operations was inadvertently omitted from the back of the DFA 52. The definition included on the 5/88 revision is still valid with the clarification noted above. The DFA 52 will be revised for the November 1988 time study month to include the definition of program operations.

1. Line D1, previously entitled Job Club Workshop, is now designated Job Club. This line will be used to record program operations activities which relate to the one-week workshop followed by the two-week supervised job search.
2. Line D2, previously entitled Job Search, is now designated as Supervised Job Search. This line will be used to record program operations activities which relate to supervised job search. Time related to the Job Club Workshop is not recorded on this line.
3. Line D3, previously entitled Basic Education, is now designated as Short-Term PREP.

4. Line D4, previously entitled Vocational Training, is now designated as Long-Term PREP.
5. Program Operations lines for Basic Education, Vocational Training, and Other Training and Education have been eliminated since CWD casework staff do not time study to these components.

EDP Time Study (DFA 48)

The DFA 48 has been revised effective with the July - September 1988 quarter to include time study hours for SAWS-related data processing activities. The categories related to the SAWS previously identified on the EDP-SAWS Time study, DFA 48A, have been added to the DFA 48 to create a combined EDP time study form. The DFA 48A has been eliminated this quarter. The DFA 48 is to be completed by all CWD staff engaged in EDP activities on both SAWS-related projects as well as non-SAWS-related projects.

The CWD-EDP employees are defined as those staff who are organizationally assigned to the EDP function on an ongoing basis with the responsibility of performing specific data processing activities. The assignment may be on a less than full-time basis. Time may be charged to either Maintenance and Operations or Developmental Project activities. If the assignment is less than full-time, the non-EDP time will be recorded as non-EDP on the DFA 48, and a corresponding Clerical and Administrative Support Staff Time Study/Time Certification (DFA 7) will be completed to account for this non-EDP time in accordance with each County's approved Annual Time Reporting Plan (ATRP). For the 18 non-ATRP Counties, this balance of time will continue to be treated as a generic support salary cost.

The CWD non-EDP staff temporarily assigned to perform EDP activities, e.g., the development or installation of an EDP system, will report time in the Development Project category only. All non-EDP time of these staff will be reported to the non-EDP line. The non-EDP time must be recorded on the applicable casework time study or, for clerical and administrative staff, on the DFA 7 in accordance with the County's approved ATRP. For the 18 non-ATRP Counties, this balance of time will continue to be treated as a generic support salary cost.

Staff Development Time Study (DFA 50)

The DFA 50 has been revised effective with the July - September 1988 quarter. The time study lines have been expanded to allow trainers and other time study staff to write in the specific program for which training is being provided.

Counties were notified in the ACL implementing the time reporting instructions for clerical and administrative support staff that clerical staff who are assigned 100 percent to the staff development office are not required to complete the DFA 50. All of their salary and benefits are claimed in the Staff Development cost pool. If clerical staff perform non-staff development activities, their non-staff development time must be recorded on the DFA 7 and the salaries prorated accordingly. Similarly, other staff development workers, e.g., trainers, their first-line supervisors, or training coordinators who are not assigned full-time to the staff development office, must report their non-staff development activities on the applicable caseworker time study or DFA 7. For the 18 non-ATRP Counties, the non-staff development time for clerical and administrative support staff will continue to be treated as a generic support salary cost.

Second-line and above supervisors who are solely dedicated to the staff development office will not complete the DFA 50. All of their salary and benefits are claimed in the staff development cost pool. Second-line and above supervisors who are not assigned 100 percent to the staff development office do not complete the DFA 50. Their time is reported on the DFA 7 in accordance with the County's ATRP. For the 18 non-ATRP Counties, this time will continue to be treated as a generic support salary cost.

Trainees whose salaries and benefits are claimed in the staff development cost pool, in accordance with the Manual of Policies and Procedures, Division 14, do not complete the DFA 50. Trainees are not required to complete any time study for the period in which their salaries and benefits are claimed as a staff development cost.

For time spent in training which does not meet the criteria contained in Division 14, the trainees must record their training time on the applicable non-staff development time study to the program (caseworkers) or function (clerical and administrative support staff) with which the training is associated, and the salaries and benefits claimed accordingly. If the training is not related to a specific program (casework) or function (clerical and administrative support staff), the training time is recorded as nonallocable.

Casework First-Line Supervisors

The ACL No. 79-40 advised Counties that Social Services first-line supervisors would be required to complete their time studies by using the allocable time of their immediate staff as a basis for distributing supervisorial time to the programs.

As a result of a Federal review in California, the existing policy covering time studying for Eligibility and Nonservice, Welfare Fraud and Employment Services casework supervisors has been reevaluated. Effective July 1, 1988, all first-line casework supervisors must complete their time study using the allocable time spent by their immediate casework staff as a basis for distributing supervisorial time to programs. However, first-line supervisors who perform casework activities or quality assurance/supervisory review activities, as described in ACL No. 86-32, should record their time to the appropriate program line(s) on the applicable casework time study. The remaining supervisorial time will then be allocated based on their casework staff.

Nonallocable Time

The Special Instruction section of all time study documents has been amended. Please note that time spent for breaks must now be recorded as nonallocable.

Direct Service Delivery Time

Counties were notified in the ACL implementing the time reporting instructions for clerical and administrative support staff that services aides, vocational assistants, clerk drivers, etc., providing services to clients, e.g., transportation, will time study these activities on the DFA 7. The salary and benefits associated with these activities will be reported as a direct cost for claiming purposes.

Casework staff providing direct service delivery to clients will continue to record time to the applicable program on the appropriate casework time study form.

All questions concerning this letter should be directed to the Fiscal Policy and Procedures Bureau at (916) 445-7046 or ATSS 495-7046.



ROBERT L. GARCIA
Deputy Director
Administration

cc: CWDA